1401 Main Street, Suite 900

ORS

Pho

Phone: (803) 737-0800

jnelson@regstaff.sc.gov

Jeffrey M. Nelson Chief Legal Officer

December 3, 2018

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Request for Name Change of Carolina Water Service, Incorporated to Blue

Granite Water Company **Docket No. 2018-365-WS**

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") that ORS has reviewed the request submitted by Carolina Water Service, Incorporated ("CWS" or the "Company") in the above-referenced Docket. The Company requests permission to change its legal name to Blue Granite Water Company and requests waiver of customer notification. The Company states the change will be in name only and will have no impact on the Company's service or rates. The Company requests expedited approval.

ORS opposes expedited approval of the name change request. ORS does not object to the request to change the legal corporation name from CWS to Blue Granite Water Company. However, the Company indicated in its request that other legal and regulatory filings as required by the Secretary of State ("SOS") and the SC Department of Health and Environmental Control ("DHEC") have not been completed. The Company should be required to file with the Commission the new Certificate of Existence from the SOS and all DHEC permits authorizing operations under the new name prior to the Commission granting approval of the request.

Letter-Jocelyn G. Boyd Page 2 of 2 December 3, 2018

ORS objects to the request to waive customer notification of the name change. ORS reviewed the Company's proposed customer notice in Attachment A and finds it lacks sufficient information regarding the impacts of the name change on customers. ORS recommends the Commission require the following information to be included in the Company's notice to customers:

- 1. A concise statement identifying the reason for name change.
- 2. Effective date of any changes to contact information including, but not limited to, new office address, updated web address, email address, contact number, and emergency contact information.
- 3. Effective date and detail of any changes to how Company employees and/or Contractors will be identified (i.e. uniform and truck markings).
- 4. Effective date of changes to bill forms and an overview of the changes to the bill form including, but not limited to, the name and logo presented on the bill.
- 5. Identify any changes to payment methods such as new mailing address and the date payments will need to be remitted under the new name.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Jeffrey M. Nelson

cc: Joseph Melchers, Esquire (via E-mail) All Parties of Record (via E-mail)